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REMARKS

In the Non-Final Office Action, Examiner Nguyen rejected pending claims 25-44 on various grounds. The Applicant responds to each rejection as subsequently recited herein, and respectfully requests reconsideration and further examination of the present application under 37 CFR § 1.112:

- A. Examiner Nguyen rejected pending claims 34-41 under 35 U.S.C. §112, ¶1 as failing to comply with the written description requirement

The Applicant has amended claims 34-41 herein to removal his recitation of the term "node" from within claims 34-41. Withdrawal of the rejection of claims 34-41 under 35 U.S.C. §112, ¶1 as failing to comply with the written description requirement is therefore respectfully requested.

- B. Examiner Nguyen rejected pending claims 25-33 and 42-44 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,618,031 to *Bohn* et al.

The Applicant has thoroughly considered Examiner Nguyen's remarks concerning the patentability of claims 25-33 and 42-44 over *Bohn*. The Applicant has also thoroughly read *Bohn*. To warrant this §102(e) rejection of claims 25-33 and 42-44, *Bohn* must show each and every limitation of independent claim 25 in as complete detail as in contained in independent claim 25. See, MPEP §2131. The Applicant respectfully traverses this §102(e) rejection of claims 25-33 and 42-44, because *Bohn* fails to disclose, teach or suggest the following limitations of independent claim 25:

1. "a second secondary circuit coupled to said primary circuit for receiving a second secondary voltage as a function of the primary voltage, said second secondary circuit including a second sub-array of LEDs of a second color, a second sub-array switch operable in a

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second ON state for allowing a flow of a second LED current through said second sub-array of LEDs, the second LED current being a function of said second secondary voltage, and a second sub-array controller for controlling an operation of said second switch in the second ON state"; and

2. "wherein said first sub-array controller controls the operation of said first sub-array switch in the first ON state and said second sub-array controller controls the operation of said second sub-array switch in the second ON state in a mutually exclusive manner".

Specifically, *Bohn* disclose three embodiments of drive circuits for a LED based display device of multiple colors.

The first embodiment as illustrated in FIGS. 3, 4, 6, 7, 14 and 15 employs a primary circuit (now shown) for generating a primary voltage in the form of a supply voltage, and a single secondary circuit employing a red LED D11, a green LED D12, and blue LED D13 for receiving a secondary voltage in the form of led voltage VLED that is a function of the primary supply voltage. *Bohn* further discloses various PWM based circuits for coupling the primary circuit to the secondary circuit whereby a portion of the secondary voltage VLED is applied to LEDs D11-D13.

The second embodiment as illustrated in FIG. 8 employs a primary circuit (now shown) for generating a primary voltage in the form of a supply voltage, and a single secondary circuit employing an array of LEDs D18-D53 for receiving a secondary voltage in the form of led voltage VLED that is a function of the primary supply voltage. *Bohn* further discloses various PWM based circuits for coupling the primary circuit to the secondary circuit whereby a portion of the secondary voltage VLED is applied to LEDs D18-D53.

The third embodiment as illustrated in FIG. 9 employs a primary circuit (now shown) for generating a primary voltage in the form of a supply voltage, and a single secondary circuit employing a red, green and blue LED array 25, and a single controller (not shown) for controlling a column selector 27 and a row selector 29 in

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selectively applying a red secondary voltage from red-PWM power source 21, a green secondary voltage from green-PWM power source 22, and a blue secondary voltage from blue-PWM power source 23.

However, in all three embodiments, *Bohn* fails to disclose and teaches away from additional secondary circuits coupled to the primary circuit as required by the aforementioned limitations of independent claim 25 by teaching a single comprehensive secondary circuit containing a full complement of LEDs.

Withdrawal of the rejection of independent claim 25 under 35 U.S.C. §102(e) as being anticipated by *Bohn* is therefore respectfully requested.

Claims 26-33 and 42-44 depend from independent claim 25. Therefore, dependent claims 26-33 and 42-44 include all of the elements and limitations of independent claim 25. It is therefore respectfully submitted by the Applicant that dependent claims 26-33 and 42-44 are allowable over *Bohn* for at least the same reason as set forth herein with respect to independent claim 25 being allowable over *Bohn*. Withdrawal of the rejection of dependent claims 26-33 and 42-44 under 35 U.S.C. §102(e) as being anticipated by *Bohn* is therefore respectfully requested.

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SUMMARY

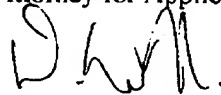
Examiner Nguyen's §112, ¶1 rejections of claims 34-41 has been obviated by the amendment herein of claims 34-41. Examiner Nguyen's §102 rejection of claims 25-33 and 42-44 has been obviated by the remarks herein supporting an allowance of claims 25-33 and 42-44 over *Bohn*. The Applicant therefore respectfully submits that claims 25-44 as listed herein fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested. If any points remain in issue that may best be resolved through a personal or telephonic interview, Examiner Nguyen is respectfully requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,
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